

Paul S. Padda, Esq. (NV Bar #10417)
Email: psp@paulpaddalaw.com
PAUL PADDALAW, PLLC
4240 West Flamingo Road, Suite 220
Las Vegas, Nevada 89103
Tele: (702) 366-1888
Fax: (702) 366-1940

Attorney for the Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

SHENDONNA SOPHIA McLAINE,

Plaintiff,

v.

CLARK COUNTY, NEVADA; *et. al.*,

Defendants.

Case No. 2:14-cv-0288-JAD-GWF

ECF No. 116

**STIPULATION FOR EXTENSION OF TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

(THIRD REQUEST)

Pursuant to Federal Rules of Civil Procedure 6(b) and the Court's Local Rule of Civil Practice ("LRCP") 7-1, the parties respectfully request that the Court extend the current deadline for Plaintiff to respond to Defendants' motions for summary judgment (Pacer #109 and #110) to and until May 19, 2017 (Friday). This is the parties' third request for an extension of time. Plaintiff's current deadline is April 18, 2017.

In support of this stipulation, the parties wish to advise the Court of the following:

1. This is a civil rights case involving five separate Defendants. Each Defendant moved for summary judgment on January 30, 2017.

. . .

2. Plaintiff's counsel has requested counsel for Defendants agree to this stipulation based upon his current trial/work schedule and the need to devote sufficient time to preparing responses to Defendants' dispositive motions. In support of this request, Plaintiff's counsel cites the fact that he has been in trial since March 20, 2017 in David Moradi v. Nevada Property 1, LLC, et. al., Clark County District Court (case number A-14-698824-C). Trial in that matter, a complex case involving a traumatic brain injury, is ongoing and expected to conclude this Friday (April 21, 2017) with closing arguments likely to occur on Monday (April 24, 2017). Although undersigned counsel is not the sole attorney representing Plaintiff in the Moradi case, his presence at trial proceedings is necessary and required.

3. In the midst of the foregoing, counsel for Plaintiff has also advised that a client of his was just recently indicted on federal charges this past week and is expected before this Court tomorrow for his initial appearance. *See* United States v. David Nakama Oancea, 2:17-cr-0116-JAD-CWH. The case has generated significant publicity and counsel for Plaintiff was required to unexpectedly devote significant time this past week to various aspects of the case.

4. Counsel for Defendants do not oppose Plaintiff's request for additional time to respond to the dispositive motions provided they are allowed 30-days to file a reply to any response that may be filed by Plaintiff. Obviously, given his own request, Plaintiff's counsel has no issue with providing Defendants additional time to file replies.

5. The additional time requested herein should provide sufficient time for Plaintiff's counsel to complete and file an appropriate response. In fact, Plaintiff's counsel is requesting a 30-day extension with the expectation that this will be more than sufficient time to complete responses in this matter despite any unexpected developments that may arise in other cases similar to what has recently occurred.

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6. The parties respectfully request that the Court approve this stipulation.

Respectfully submitted,

/s/ Lucinda L. Coumou

/s/ Paul S. Padda

Lucinda L. Coumou, Esq.
Chief Deputy District Attorney, Civil Division
Clark County District Attorney's Office

Paul S. Padda, Esq.
Paul Padda Law

Attorney for Defendant Clark County, Nevada

Attorney for Plaintiff

Dated: April 18, 2017

Dated: April 18, 2017

/s/ Noel E. Eidsmore

Robert W. Freeman, Jr., Esq.
Noel E. Eidsmore, Esq.
Lewis Brisbois Bisgaard & Smith

Attorney for Officers Friedman and Zaccara
and the Las Vegas Metropolitan Police Department

Dated: April 18, 2017

IT IS SO ORDERED:

The Court hereby approves the parties' stipulation for extension of the current deadline for responding to the motions for summary judgment filed on January 30, 2017 (Pacer #109 and #110). Plaintiff's responses shall be due on or before May 19, 2017 and each Defendant shall have 30 days after Plaintiff files a response to submit a reply (if any).


UNITED STATES DISTRICT JUDGE

Dated: April 19, 2017

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CERTIFICATE OF SERVICE

In compliance with the Court's Local Rules, the undersigned hereby certifies that on April 18, 2017 a copy of the foregoing document, "STIPULATION FOR EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT" was served (via the Court's CM/ECF system) upon all counsel of record in this litigation.

/s/ Paul S. Padda

Paul S. Padda, Esq.